

IN THE UNITED STATES DISTRICT COURT

DISTRICT OF HAWAII

WIHC LLC dba ALOHA
TOXICOLOGY,

Plaintiff,

vs.

NEXTGEN LABORATORIES, INC.,
OHANA GENETICS, INC., HEIDI
MAKI, STEPHANIE SIMBULAN,
and DOE DEFENDANTS 1 – 20,

Defendants.

CIVIL NO. 1:18-cv-00261-JMS-RLP
(18 U.S.C. §§ 1836 and 1962)

**DECLARATION OF DAN
HLAVACHEK; EXHIBITS “A” –
“C”**

DECLARATION OF DAN HLAVACHEK

I, DAN HLAVACHEK, hereby declare and state as follows:

1. I am a member and owner of WIHC LLC dba Aloha Toxicology ("Aloha Toxicology").
2. I make this Declaration upon personal knowledge, unless otherwise indicated, and am competent to testify to all matters stated in this Declaration.
3. Aloha Toxicology has consistently been doing business with Cordant Health Solutions (“Cordant”), located in Denver Colorado, since 2015. True and correct copies of six Cordant’s invoices are attached hereto as **Exhibit A**.

4. Cordant is Aloha Toxicology's reference laboratory. Cordant also provides Aloha Toxicology with additional services that Aloha Toxicology does not provide to clients, such as saliva testing.

5. By using services like Cordant's, Aloha Toxicology can offer saliva testing services to clients.

6. Aloha Toxicology has agreements with its customers including Customized Account Requests. True and correct copies of certain Aloha Toxicology Customized Account Requests are attached hereto as **Exhibit B**.

7. Of the items purchased by Heide Maki and/or Stephanie Simbulan on April 11, 2018, none of these items have been returned to Aloha Toxicology. A true and correct copy of the Email Receipt from Best Buy, dated April 11, 2018, is attached hereto as **Exhibit C**.

I declare under penalty of perjury and the laws of the State of Hawaii that the foregoing is true and correct.

Dated: Brookfield, Wisconsin: November 12/2018.



DAN HLAVACHEK